

US EPA ARCHIVE DOCUMENT



U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION 9

CLEAN WATER ACT COMPLIANCE OFFICE

NPDES COMPLIANCE EVALUATION INSPECTION REPORT

Utility Name: City of West Hollywood Sewage Collection System

NPDES Permit Number: N/A

Date of Inspection: December 22, 2011

Inspection Participants:

Inspector	Agency
JoAnn Cola	Environmental Protection Agency
Jim Fischer	California Water Resources Control Board
Andrew Choi	Los Angeles Regional Water Board
Chris Lopez	Los Angeles Regional Water Board
Jose Morales	Los Angeles Regional Water Board

Utility Personnel	Title
Sharon Perlstein	City Engineer

Report Prepared By: JoAnn Cola, Environmental Engineer

Date Prepared: May 30, 2012

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	I Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A --- State (Contractor)	Q --- Other Inspectors, Federal/EPA (Specify in Remarks columns)
B --- EPA (Contractor)	R --- Other Inspectors, State (Specify in Remarks columns)
C --- Corps of Engineers	S --- EPA Regional Inspector
J --- Joint EPA/State Inspectors—EPA Lead	T --- State Inspector
L --- Local Health Department (State)	U --- Joint State/EPA Inspectors—State lead
N --- NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 --- Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 --- Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 --- Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 --- Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 --- Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

Single Event Violation Table - Codes and Descriptions*

CODE	DESCRIPTION	CODE	DESCRIPTION
Effluent Violations		CSO	
A0018	Approved Bypass	A0C18	Approved Bypass
A0013	Failed Toxicity Test	A0024	Dry weather overflow
A0023	Industrial Spill	B0030	Failure to Develop Adequate LTCP
A0017	Inspection sample above historic DMR range	B0031	Failure to Implement LTCP
A0022	Narrative Effluent Violation	B0029	Failure to Implement Nine Minimum Controls (NMCs)
A0012	Numeric effluent violation	BC291	Failure to implement required NMC #1 (Proper operation and maintenance)
A0016	Reported Fish Kill	BC292	Failure to implement required NMC #2 (Maximum use of the collection system)
A0011	Unapproved Bypass	BC293	Failure to implement required NMC #3 (Review pretreatment requirements)
A0015	Unauthorized Discharge of Brine	BC294	Failure to implement required NMC #4 (Maximization of flow)
Management Practice Violations		BC295	Failure to implement required NMC #5 (Elimination of dry weather flow)
B0019	Best Management Practice Deficiencies	BC296	Failure to implement required NMC #6 (Control of solids)
B0024	Biosolids/Sewage Sludge Violation (Part 503)	BC297	Failure to implement required NMC #7 (Pollution prevention programs)
B0026	Failure to Allow Entry	BC298	Failure to implement required NMC #8 (Public notification)
B0012	Failure to Conduct Inspections	BC299	Failure to implement required NMC #9 (Monitoring)
B0027	Failure to Develop Adequate SPCC Plan	B0C41	Failure to Maintain Records or Meet Record Keeping Requirements
B0017	Failure to develop any or adequate SWPPP/SWMP	C0C11	Failure to monitor
B0011	Failure to Develop/Enforce Standards	E0C16	Failure to submit required report (non-DMR)
B0028	Failure to Implement SPCC Plan	E0C13	Improper/Incorrect reporting
B0018	Failure to Implement SWPPP/SWMP	B0044	LTCP implementation schedule milestone missed
B0041	Failure to Maintain Records	A0C22	Narrative effluent violation
B0040	Improper Chemical Handling	E0C14	Noncompliance with section 308 Information Request
B0023	Improper Land Application (non-503, non-CAFO)	A0C12	Numeric effluent violation
B0020	Improper Operation and Maintenance	A0C11	Related Unapproved Bypass
B0025	Inflow/Infiltration (I/I)	A0021	Unauthorized CSO Discharge to Waters/Wet Weather
B0021	Laboratory Not Certified	A0025	Unauthorized overflow to dry land or building backup
B0022	No Licensed/Certified Operator	B0045	Violation of a milestone in a permit
B0042	Violation of a milestone in an order	B0C42	Violation of a milestone in an order
Monitoring Violations		SSO	
C0017	Analysis not Conducted	A0S18	Approved Bypass
C0011	Failure to Monitor for non-Toxicity Requirements	A0020	Discharge to Waters
C0021	Failure to Monitor for Toxicity Requirements	D0S11	Discharge without a valid permit (includes satellite systems)
C0015	Frequency of Sampling Violation	B0S41	Failure to Maintain Records or Meet Record Keeping Requirements
C0018	Improper Analysis or Lab Error	C0S11	Failure to monitor
C0014	Invalid/Unrepresentative Sample	E0018	Failure to report other violation
C0016	No Flow Measurement Device	E0019	Failure to report violation that may endanger public health 122.41(l)(7)
Permitting Violations		D0S12	Failure to submit required permit application info (includes satellite systems)
D0014	Application Incomplete	B0S20	Improper Operation and Maintenance
D0011	Discharge Without a Valid Permit	A0S22	Narrative effluent violation
D0012	Failure to Apply for a Permit	E0S14	Noncompliance with section 308 Information Request
D0015	Failure to Pay Fees	A0S12	Numeric effluent violation
D0016	Failure to Submit Timely Permit Renewal Application	A0026	Overflow to Dry Land or Building Backup
D0013	Unapproved Operation	A0S11	Related Unapproved Bypass
D0017	Violation Specified in Comment	BS42A	Violation of milestone in an administrative order
		BS42J	Violation of milestone in judicial decree
		B0046	Violation of sewer moratorium or restriction
Reporting Violations		Storm Water Construction	
E0017	Failure to Notify	D0R11	Discharge without a permit

E0012	Failure to Submit DMRs		D0R18	Failure to apply for a notice of termination
E0016	Failure to submit required report (non-DMR, non-pretreatment)		B0R12	Failure to Conduct Inspections
E0013	Improper/ Incorrect Reporting		B0C17	Failure to develop any or adequate SWPPP/SWMP
E0011	Late Submittal of DMRs		B0C18	Failure to Implement SWPPP/SWMP
E0014	Noncompliance with Section 308 Information Request		B0R41	Failure to Maintain Records
Pretreatment			C0R11	Failure to Monitor
C0012	Baseline Monitoring Report Violation		BR19A	Failure to properly install/implement BMPs
B0P12	Failure to Conduct Inspections		BR19B	Failure to properly operate and maintain BMPs
B0P11	Failure to Develop/Enforce Standards		D0R12	Failure to submit required permit application information
B0013	Failure to Enforce Against I/U		E0R16	Failure to submit required report (non-DMR)
B0015	Failure to Establish Local Limits		A0R22	Narrative effluent violation
C0013	Failure to Establish Self-Monitoring Requirements		E0R14	Noncompliance with section 308 Information Request
B0014	Failure to Issue SIU Permits		A0R12	Numeric Effluent Violation
B0016	Failure to Meet Inspection and Sampling Plan for SIUs		B0R42	Violation of a milestone in an order
E0015	Failure to submit required report (non-DMR)		Storm Water MS4	
B0P40	Improper Chemical Handling		D0M11	Discharge without a permit
A0014	IU Violation of Pretreatment Standards		D0M18	Failure to apply for a notice of termination
CAFO			B0M12	Failure to Conduct Inspections
BOA19	Best Management Practice Deficiencies		B0M17	Failure to develop any or adequate SWPPP/SWMP
B0038	Direct Animal Contact with Waters of US		B0M18	Failure to Implement SWPPP/SWMP
DOA11	Discharge without a permit		B0M41	Failure to Maintain Records or Meet Record Keeping
BOA12	Failure to Conduct Inspections		C0M11	Failure to Monitor
B0032	Failure to Develop any or adequate NMP		BM19A	Failure to properly install/implement BMPs
B0033	Failure to Implement NMP		BM19B	Failure to properly operate and maintain BMPs
BOA41	Failure to Maintain Records or Meet Record Keeping Requirements		D0M12	Failure to submit required permit application information
B0043	Failure to meet order final compliance date		E0M16	Failure to submit required report (non-DMR)
COA11	Failure to Monitor		A0M22	Narrative effluent violation
DOA12	Failure to submit required permit application information		E0M14	Noncompliance with section 308 Information Request
C0019	Failure to Test Manure		A0M12	Numeric Effluent Violation
BOA40	Improper Chemical Handling		B0M42	Violation of a milestone in an order
BOA23	Improper Land Application		Storm Water Non-Construction	
B0039	Improper Manure Handling (not including land application)		D0N11	Discharge without a permit
B0037	Improper Mortality Management		D0N18	Failure to apply for a notice of termination
B0036	Improper O&M of Storage Facility		B0N12	Failure to Conduct Inspections
E0A13	Improper/Incorrect reporting		B0N17	Failure to develop any or adequate SWPPP/SWMP
B0034	Insufficient Buffers/Setbacks		B0N18	Failure to Implement SWPPP/SWMP
B0035	Insufficient Storage Capacity		B0N41	Failure to Maintain Records
A0A22	Narrative effluent violation		C0N11	Failure to Monitor
E0A16	No Annual Report Submitted		BN19A	Failure to properly install/implement BMPs
C0020	No Depth Marker		BN19B	Failure to properly operate and maintain BMPs
E0A14	Noncompliance with section 308 Information Request		D0N12	Failure to submit required permit application information
A0A12	Numeric effluent violation		E0N16	Failure to submit required report (non-DMR)
A0019	Production Area Runoff		A0N22	Narrative effluent violation
BOA42	Violation of a milestone in an order		E0N14	Noncompliance with section 308 Information Request
			A0N12	Numeric Effluent Violation
			B0N42	Violation of a milestone in an order

* N. B. The codes and code names listed herein may change over time. Please consult ICIS-NPDES and PCS system documentation for updated lists.

Attachment 1

Inspection Summary

- 1. Introduction.** On December 22, 2011, staff from EPA Region 9, the Los Angeles Regional Board, and the State Water Board inspected the wastewater collection system owned and operated by the City of West Hollywood. The purpose of the inspection was to evaluate compliance of West Hollywood's sewage collection system. West Hollywood is a city of 1.9 square miles located approximately 12 miles northwest of downtown Los Angeles with a population of 37,000. West Hollywood's sewage collection system consists of approximately 40 miles of gravity pipe. There are no pump stations or siphons. In addition to flow generated within the City of West Hollywood, a small amount of flow enters the system from the City of Los Angeles. West Hollywood is a satellite collection system tributary to Los Angeles County Sanitary District 4. Three days prior to the inspection, an e-mail was sent to the city, providing a listing of the documents to prepare for the inspection. Ms Sharon Perlstein, City Engineer for the City of West Hollywood, represented the City during the inspection. She said that she was unable to obtain the information required for the inspection within the three day period; therefore, the inspection was abbreviated. On January 10, 2012, the Los Angeles Regional Board issued an order to West Hollywood requiring all of the information be provided by January 31, 2012. Ms Perlstein obtained and provided the requested information, including the completed Inspection Form (EPA completed the inspector names and agencies section). This summary provides highlights of EPA's findings.
- 2. Regulatory Requirements.** Discharges to waters of the United States without a permit are prohibited by Section 301(a) of the Clean Water Act. The City of West Hollywood is also subject to the provisions of the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003-DWQ.
- 3. Occurrence of SSOs.** Discharges to waters of the United States without a permit are prohibited by Section 301(a) of the Clean Water Act. In addition, Part C.1 Prohibitions of the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003-DWQ, states that any spill that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited.

During the 5-year period between January 1, 2007 and December 20, 2011, 34 Sanitary Sewer Overflows ("SSOs") occurred due to blockages or problems originating in City-owned assets, according to both the California Integrated Water Quality System ("CIWQS") database and the inspection questionnaire that was filled out by the City of West Hollywood and submitted following the inspection. Of these, 16 SSOs were reported by the City to have reached surface waters. The City owns 40 miles of pipe and although it contracts for maintenance with Los Angeles County Department of Public Works ("LACDPW"), it ultimately has the primary responsibility for the proper operation and maintenance of city-owned pipes.

Of the SSOs reported to the CIWQS database by the City, the failure of an 80 year old pipe accounted for four separate SSO reports, having occurred in four locations over a period of two days. However, according to the inspection form completed by the City, approximately 70% of the reported SSOs were due either to Fats, Oils, and Grease (“FOG”), intrusion of roots into the pipes, or a combination of both.

Recommendation: The City is required by Paragraph D.3. of Order No. 2006-0003-DWQ to take all feasible steps to eliminate SSOs. To increase its efforts toward reducing SSOs the city should have a thorough knowledge of the system and its operation and maintenance. It should take a more active role in operation and maintenance of its sewer system and in the administration of its maintenance contracts. The focus on preventive maintenance programs, including FOG and root control programs should be intensified.

- 4. Documentation of SSOs.** Monitoring and Reporting Program No. 2006-0003-DWQ establishes requirements for monitoring, recordkeeping, and reporting. Paragraph B of the Monitoring Program requires that the documentation related to SSOs must be maintained by the Enrollee for a period of five years. The required documents include copies of the report submitted to California Integrated Water Quality System (“CIWQS”), logs of SSO calls, service call records, SSO records, complaints, and maintenance records.

Paragraph F.1. of the State Water Resources Control Board’s Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements provides for facility inspection and record availability during reasonable hours; however, there is no requirement for providing advance notice of inspection. Paragraph G. of the State Water Resources Control Board’s Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements requires Enrollees to furnish to inspectors, upon request, copies of all documents that are to be maintained under the Order. Ms Perlstein, the City Engineer for West Hollywood, was unable to produce most of the documents that had been requested in an e-mail sent three days before the date of the inspection. She told the inspection team that because the City contracts for maintenance services with Los Angeles County Department of Public Works (“LACDPW”), the documents are maintained by LACDPW, and not by the City. She told inspectors that she had tried to obtain the documents, but because it was during the winter holiday season, she was unable to acquire documents or have any LACDPW staff attend the inspection interview to respond to questions. When the inspection team asked Ms Perlstein about touring food service establishments (“FSE”) that had been recently retrofit with grease interceptors, she responded that she had unsuccessfully attempted to contact Industrial Waste at Los Angeles County to request staff to come to West Hollywood. She was unwilling to accompany the inspection team. She was unable to provide to inspectors a listing of the FSEs in West Hollywood, or any information regarding which of the FSEs had been recently required to install retrofit interceptors.

Until July 2011, the City maintained no records of calls reporting sewer problems, nor any records of its calls to LACDPW dispatch. Ms Perlstein told the inspection team that the City began to use its new GovPartner customer service software in July 2011 to record all incoming calls. The City submitted its GovPartner log, which contained two sewer calls received since July 2011, but the time of the original call and the time the call was dispatched to the county is not clear. The LACDPW records provided do not record the time the initial call came in to the city; only the time calls were received by its

dispatcher. The total SSO response time, from initial call until crews arrived on site, was impossible to determine for any of the 34 SSOs.

Recommendation: Paragraph B of the Monitoring and Reporting Program No. 2006-0003 DWQ requires all Enrollees to maintain SSO records for a minimum of five years. Such records include, but are not limited to, records of all service calls made to the Enrollee, complaint logs, SSO records, work orders, maintenance records, and calls made to report SSOs. Regardless the fact the city contracts for maintenance, the City of West Hollywood is an Enrollee, and as such is required to comply with the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements. The City of West Hollywood should immediately begin to accurately record the time calls are received by the City, and times the City dispatches calls to LACDPW. The City should collect and retain records of SSO calls from all sources. The City should also immediately begin to maintain files of all required SSO records to comply with the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements.

Reporting of SSOs. Paragraph A of the Monitoring and Reporting Program No. 2006-0003 DWQ establishes requirements for the reporting of SSOs. The Los Angeles Regional Board sent an information request letter to West Hollywood dated January 10, 2012, requesting a log of all sewer complaints & SSO calls reported to the City since 2007. West Hollywood's response included a log from its GovPartner system, a spreadsheet dispatch log provided by the LACDPW and a list of spills reported to CIWQS. During the inspection, Ms Perlstein told inspectors that during business hours, the city receptionist took calls and called LACDPW. During non-business hours, callers could call the Sheriff's office to report SSOs. Ms Perlstein told inspectors that the GovPartner system was now being used by the city receptionist, and had been in place since July 2011. Of five apparent spills that occurred since July 2011, two were logged in GovPartner, and three spills were on the county's spreadsheet dispatch log and reported to CIWQS. The two spills that had been reported directly to West Hollywood and logged into GovPartner occurred on November 9, 2011 and on December 19, 2011. Although the December complaint appears to have been reported as "sewage in the street" and reported by West Hollywood to the county for response, neither the November or December call is listed on LACDPW's dispatch log of spills, nor on the list of CIWQS reported spills, as of March 2012. Despite the notes on the GovPartner logs that appear to indicate the problems were not in city sewer pipes, the December call regarding "sewage in the street" warranted dispatch and response. The City did not provide information regarding sewer complaints that were made to agencies other than itself or LACDPW, for example, to the Sheriff's Office.

SSOs can be reported at any time to either the county Sheriff's Office or to LACDPW dispatch, or to the city during normal business hours. The City of West Hollywood's website, www.weho.org, contains various telephone numbers, web links, a city department directory, and frequently asked questions. There are no contacts listed on the City's website for residents to report SSOs, nor is any protocol described for reporting SSOs. The April 2011 West Los Angeles area telephone directory has no specific numbers in the City of West Hollywood government listings for reporting SSOs.

SSO start time should reflect as closely as possible the actual time the SSO began, or the time it was first observed. SSO start times reported by LACDPW appear to be based on the time the SSO call was dispatched to LACDPW, not when it was actually noticed by the reporting party, or even the time the call was initially received by the city. The City did not provide field SSO reports, therefore, there is no explanation of how spill volumes

were estimated by LACDPW. According to CIWQS data, the spill rate was indicated in only one of thirty-four reports. Using the LACDPW SSO dispatch log to calculate the amount of time between LACDPW notification to the time the crew was reported on the spill site, it can be seen that in many cases the calculated response time exceeded the reported total duration of the spill. No explanation was offered. On the inspection questionnaire, the city reported that the average response time during business hours was 0.9 hours, and 1.6 hours after hours. Beginning from the time the call was received at LACDPW dispatch until the crew arrived at the site of the SSO, actual response time calculated from LACDPW data averaged 1.5 hours during business hours and 2.6 hours during non-business hours. The minimum reported response time was 0 hours, and the maximum was 12 hours. The response time calculated from LACDPW data does not include the time that begins with the initial call to the city. According to the city's GovPartner report, the December 19, 2011 SSO was reported to LACDPW dispatch 40 minutes after the call came in.

A review of data provided in January 2012 by West Hollywood identifies inconsistencies in the SSO information. The City reported on the inspection questionnaire that 12 building backups occurred between 2007 and 2011; yet, it appears that 16 such backups were reported by LACDPW to CIWQS. A basement backup mentioned in the inspection questionnaire by the City that occurred on February 17, 2010 on Flores Ave. does not appear on LACDPW's lists of SSOs dispatched by the City or reported to CIWQS. An SSO reported to CIWQS on September 1, 2011 indicates the time the SSO began was 12:00 PM; on LACDPW's spreadsheet of dispatched SSO calls, dispatch was notified at 4:45 PM; but the crew was dispatched at 12:00 PM. Similarly, a second SSO was reported to CIWQS on that date as having started at 9:48 AM; but according to LACDPW's spreadsheet of dispatched SSO calls, dispatch was notified at 4:45 PM, yet the crew was dispatched out at 9:48 AM. One possible explanation is that the log is merely inaccurate; another is that the crew had actually been dispatched the following day.

Recommendation: To comply with the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements, West Hollywood must make every effort to maintain a complete, accurate, and consistent set of SSO records. To prevent reporting delays and reduce response time, the City should make the telephone numbers for reporting SSOs easily available to the public, either on its website or in the telephone directory, for reporting during business and non-business hours. West Hollywood should develop and implement a complete communication strategy to make certain that no matter where the first call is received, response crews are notified of SSO calls in a timely manner and information about each SSO is relayed back to West Hollywood.

- 5. Response to SSOs.** Paragraph D.3 of the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements establish that West Hollywood must take all feasible steps to prevent SSOs from occurring, and to contain and mitigate SSOs when they do occur. In addition, Paragraph 13 requires the City of West Hollywood to develop and implement SSMP, including an Overflow Emergency Response Plan ("SSORP"). The SSORP must include procedures to ensure timely notification and response to SSOs, and a program to assure an adequate response to SSOs. The City of West Hollywood SSORP does not cover activities for City staff because it defers all SSO response activities to its contractor, LACDPW. Most of West Hollywood's SSMP, including the SSORP, consists of sections copied from the

LACDPW SSMP. The LADCPW SSMP covers all unincorporated areas of Los Angeles County plus 42 cities which contract with it for operation and maintenance, the SSMP and SSORP do not include details specific to West Hollywood; therefore, neither SSORP contain detail related specifically to SSOs in the City of West Hollywood.

According to Paragraph V.A. of LACDPW's "Sewer Maintenance District's Maintenance and Operations Manual", LACDPW provides 24-hour SSO emergency response with a 2-hour response time goal. According to Ms Perlstein, LACDPW crews respond to service calls from West Hollywood from their South Yard, which is located in Lawndale, approximately 20 miles away. The City's inspection questionnaire states that the SSO response time goal is two hours, and that during business hours the average response time is 0.9 hours, and 1.6 hours during non-business hours. A review of the response times in "LACDPW sanitary sewer overflow CIWQS and dispatch log" provided by West Hollywood reveals that the response time exceeded the 2-hour goal in 13 of 38 SSOs. The LACDPW spreadsheet contains columns headed "time DPW dispatch notified" and "time DPW crew was notified"; there is no entry for when the first call came in to the city. West Hollywood provided a log of two sewer calls made to the city since July 2011: one call appears to have been relayed to LACDPW 40 minutes after the initial call, and the time the call was relayed was not apparent from the second entry. It is not clear whether the City tracks any SSO calls made during non-business hours. The actual SSO response time should be calculated from the time of the first observation or notification until the crew arrives at the site.

According to the inspection questionnaire, LACDPW uses CCTV to inspect the pipe following each SSO. However, review of the LACDPW data provided by the City reveals 34 reported SSO locations and 29 CCTV inspections; of these, 8 locations do not appear to match any of the SSO locations. The LACDPW SSORP does not state that CCTV shall be performed following all SSOs.

Recommendation: To comply with the State Water Resources Control Board's Order No. 2006-0003-DWQ, West Hollywood must make every effort to respond in a timely manner to SSOs. The City must take all feasible steps to reduce SSO response time, preferably to not longer than one hour. The City should revise its SSORP to reflect the practices to minimize response time and spill volumes specific to the City. The City could also consider purchasing equipment and training city staff to provide quick response and help contain and mitigate SSOs until the LACDPW crew arrives on site. West Hollywood should take a more active role in managing its contract with LACDPW.

6. **Preventive Maintenance.** Paragraph D.13.iv of the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements requires West Hollywood to develop and implement an SSMP, including an Operations and Maintenance Program, to include a plan for preventive maintenance. The City provides no maintenance plan or schedule of its own in the SSMP; but instead includes a section of LACDPW's SSMP, but neither SSMP includes a detailed preventive maintenance plan for West Hollywood. According to the inspection questionnaire prepared by Ms Perlstein, West Hollywood reports that one third of its system is cleaned annually by LACDPW. She reported that there are 116 hot spots in the 40 mile system, caused by either roots or FOG, which are cleaned at a minimum semi-annually to a maximum monthly frequency. The contract with LACDPW, provided to the State inspectors by the City, does not describe the preventive maintenance tasks that LACDPW is expected to perform for the City; thus, there is no written requirement that LACDPW clean one third of the system annually or to clean each of the 116 hot spots at least twice per year. Further, LACDPW's "Sewer Maintenance District's Maintenance and

Operations Manual”, state in Paragraph II.A, that cleaning of a particular pipe segment is to be performed either as a result of inspection or once every 10 years. Paragraph IV.B. states that CCTV should be performed either following an SSO or every 10 years for condition assessment. This would appear to imply that, unless an SSO had already occurred, a particular pipe segment might be inspected or cleaned by LACDPW only once every 10 years. The invoices provided to the City by LACDPW are not detailed enough to ascertain exactly what sort of preventive maintenance service was provided to West Hollywood in any particular location.

According to Ms Perlstein, West Hollywood contracts separately for CCTV inspection and condition assessment; this information is not provided to LACDPW to assist in preventive maintenance activities or to schedule small repairs. West Hollywood submitted to inspectors its 2009 CCTV data used for condition assessment and provided the CCTV data from LACDPW.

Table 1. Repeated SSO Locations

Address of SSO	Date	Reported Cause
8925 Beverly Blvd.	2/12/2007	Grease deposition and debris
Beverly Blvd.	9/1/2011	Debris in line
8919 Beverly Blvd.	9/1/2011	Debris in line
946 Doheny Drive	6/18/2008	Main line collapse
999 Doheny Drive	6/20/2011	Main line collapse
999 Doheny Drive	6/20/2011	Main line collapse
1014 Doheny Drive	6/20/2011	Main line collapse
915 Genessee Ave.	3/5/2007	Root intrusion
924 Genessee Ave.	3/5/2007	Root intrusion
947 Genessee Ave.	10/4/2009	Root intrusion
8710 Melrose Ave.	8/13/2010	Grease deposition
8751 Melrose Ave.	8/13/2010	Grease deposition
8914 Santa Monica Blvd.	4/14/2008	Grease deposition
8271 Santa Monica Blvd.	6/8/2010	Grease deposition
8279 Santa Monica Blvd.	6/8/2010	Grease deposition
8440 Sunset Blvd.	4/11/2008	Root intrusion
8462 Sunset Blvd.	8/1/2008	Grease deposition
8462 Sunset Blvd.	9/10/2008	Root intrusion
8775 Sunset Blvd.	5/24/2010	Root intrusion and grease deposition
8746 Sunset Blvd.	11/14/2010	Grease deposition and rags

According to the CIWQS database, the following sewer lines reported multiple SSOs during the past 5 years: Sunset Blvd., Melrose Ave., Doheny Dr., Beverly Blvd., Santa Monica Blvd., and Genessee Ave. Table 1, above, lists the 20 SSOs. These six streets account for 20 of the 34 reported SSOs. Five are commercial areas with a number of restaurants; Genessee Ave. is a tree-lined high density residential street. These spill locations are all on LACDPW's map of hot spots for accelerated cleaning due to either root intrusion or grease deposition; yet, repeated SSOs occurred. CCTV following an SSO can be useful in determining whether the actual source of a blockage is a pipe defect that should be repaired. A review of CCTV from 2009 and the associated condition reports of two segments of Genessee Ave submitted by West Hollywood, show numerous defects in the pipe, grease deposition, and root intrusion through cracks and fractures, laterals, and pipe joints. All three of the SSOs were reported to CIWQS as having been caused by root intrusion. LACDPW CCTV video of Santa Monica Blvd. submitted after the inspection shows numerous grease deposits; all SSOs reported to CIWQS occurring along Santa Monica Blvd. were caused by grease deposition.

Recommendation: To comply with the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements, West Hollywood should revise its SSMP to better define the preventive maintenance requirements and schedules, and ensure that each of the elements is being completed on schedule. CCTV should also be used as preventive maintenance tool, to identify causes of SSOs, update cleaning frequencies, or to help schedule repairs. The use of CCTV will also help identify locations where repairing pipe defects will prevent root infiltration. By focusing efforts on the six streets listed in Table 1, either by adjusting preventive maintenance or by repairing defects, future SSOs at those locations can be eliminated.

- 7. FOG Program.** Paragraph D.13.vii. of the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements requires West Hollywood to develop and implement an SSMP, including a FOG Control program if warranted. According to a review of West Hollywood's CIWQS data, FOG was the primary cause or contributing factor in 14 of 34, or 41%, of the reported SSOs. West Hollywood does not have its own FOG program, but contracts with Los Angeles County Industrial Waste program. The contract itself is not specific to FOG issues; it covers FOG as an element of the pretreatment program. It requires the city to maintain an industrial waste ordinance identical to the county's current ordinance. The county's website contains a 2009 draft revision which covers FOG more completely than the current ordinance so that it better complies with the requirements of the State Order. The revised ordinance has not yet been adopted. Small, under sink grease traps and mechanical grease removal devices will continue to be allowed under the revised code, if installed prior to adoption of the new ordinance.

The City indicated on the inspection questionnaire that in 2011, 113 of 246 (46%) FSEs were inspected; and that between 2007 and 2011, the average was 177 inspections per year (72%), including repeat inspections. The City provided a spreadsheet to respond to the inspectors questions regarding the FOG program; the spreadsheet titled "Item 12", provided by LACDPW listing the FSEs and which FSEs were inspected during 2011, indicates a total of 244 FSEs, of which 100 (42%) had been inspected in 2011. The spreadsheet titled "Item 13" contains 426 entries representing enforcement actions taken under the FOG program over the period 2007 through 2011, listed by FSE. The listed violations are not specific to preventing FOG from entering sewers, as some violations relate to storage or stormwater. The enforcement log appears to indicate a number of repeat visits resulting in little compliance, with some violations appearing to take several years to resolve. The spreadsheet entries are not consistently clear as to the resolution of the non-compliance issues. Some entries on the spreadsheet say "failed to comply" after several inspections, with no indication of further follow-up. According to "Item

12", 11 of the 244 FSEs installed GRDs during 2011. No evidence was submitted to demonstrate that grease interceptors have been required upon change of ownership, significant remodel, or continued non-compliance.

On September 1, 2011, West Hollywood reported to CIWQS an SSO caused by FOG. The CIWQS report indicated that a referral would be made to the FOG program, but there was no documentation submitted to suggest that this was actually done.

From the enforcement action spreadsheet, many of the FSEs utilize small, mechanical grease removal devices. Such devices often require daily cleaning. It is not clear from the documentation submitted that these devices are properly maintained.

Recommendation: To comply with the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements and eliminate SSOs caused by FOG deposition, West Hollywood should consider implementing a more aggressive FOG program. There are a number of good sources in California that can provide a description of effective FOG control programs, for example, www.calfog.org.

8. Root Elimination Program. Paragraph D.13.iv of the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements requires West Hollywood to develop and implement an SSMP, including an Operations and Maintenance Program, to include a plan for preventive maintenance. Where root intrusion causes SSOs, it should be an integral part of the preventive maintenance program. Section V.B. of the LACDPW Sewer Maintenance District's Maintenance and Operations Manual", LACDPW states that it provides root foaming when there is a root problem. Presumably, this means when there is an SSO caused by root intrusion, because the City's SSMP states in section 4.2.11 that the county stopped providing root control services. According to Ms Perlstein, West Hollywood contracts for routine chemical root control separately and in addition to whatever root control is provided by LACDPW.

The City's SSMP states that "on a rotating basis, approximately 25% of the citywide sewer system is treated with the foaming herbicide each year". According to invoices to city from Duke's Root Control, this has generally been the case since 2007. Each section of the city is treated every four years. However, it has not been enough to prevent SSOs, as 19 of the 34 SSOs during this time period were caused, at least in part, by root intrusion.

Recommendation: To comply with the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements to eliminate SSOs, West Hollywood should more aggressively attack the root intrusion problem. Wherever possible, repair or replace pipe to eliminate root intrusion. West Hollywood should consider obtaining from the City of Los Angeles a copy of *Sanitary Sewer Integrated Root Control Best Management Practice*, California Collection System Collaborative Benchmarking Group, March 2005 to help develop and implement an effective root control plan.

9. Inspection and Condition Assessment. Order No. 2006-0003-DWQ requires the SSMP to include regular visual inspection of the system in the maintenance program. The City's SSMP does not specifically describe the city's program for routine closed circuit television ("CCTV") inspection, nor does it describe a policy for inspection using CCTV following SSOs. LACDPW's SSMP and SSORP indicate that CCTV is used following SSOs. Ms Perlstein told the inspection team that part of the city was inspected using CCTV in 2009 as part of a condition assessment study. West Hollywood submitted the city's 2009 CCTV data and the associated reports along with the CCTV data from LACDPW.

LACDPW submitted the CCTV inspection identified as having been taken in an alley near Santa Monica Blvd. The CCTV was done following cleaning. A review of this inspection clearly reveals that the cleaning was not effective at removing FOG deposits. Similarly, the CCTV inspection at Genessee Ave. showed root infiltration despite hot spot cleaning and root control measures.

Between 2007 and 2011, 34 SSOs were reported by West Hollywood. LACDPW submitted 29 videos taken in 8 locations, none of them match the spill addresses. The repeat spill locations listed in Table 1 are also on the list of cleaning hot spots, according to CIWQS & LACDPW Map of Sewer Hot Spots but none are on the list of locations CCTV-inspected by LACDPW.

Recommendation: To comply with Order No. 2006-0003-DWQ, West Hollywood should revise its SSMP to make CCTV visual inspection an essential part of its preventive maintenance program. This would assure the City that routine and hot spot cleaning is effective, optimize cleaning frequencies, identify causes of SSOs, and target pipes for repairs. The City should manage its contract to ensure that LADCPW follow its SSMP and SSORP and CCTV following SSOs.

10. Sewer System Funding and Capital Improvements. Paragraph D.13.iv.(c.) of the State Water Resources Control Board’s Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements requires all Enrollees to develop an SSMP which contains an Operation and Maintenance Plan including a rehabilitation and replacement plan with a capital improvement and finance plan to plan and fund system improvements. The City of West Hollywood did not include the capital improvement plan and finance plan in its SSMP. The City submitted a summary of its capital improvement plans through the next fiscal year. The City did not submit a long term CIP or funding plan.

According to the Engineer’s Report to the West Hollywood City Council in May 2011, about 75% of the city’s pipe was installed in the 1920s, the remainder in the 1960s. About half of the pipe was CCTV-inspected in 2009 and identified \$1.75 million in necessary repairs. The report states that the Engineer predicts there will be much more inspection and repair work in future years.

Table 2 summarizes information provided in the City’s submittal “Summary of Sewer Capital Improvements”. The City has lined or replaced about 6 miles of pipe over 5 years, which represents an average system replacement rate of approximately 40 years.

Year	CIPP pipe lining (LF)	Point repairs (LF)	Manhole repairs	Install new pipe (LF)	Construction cost
2007	0	0	0	0	\$0
2008	7,253	102	0	0	\$437,442
2009	0	0	0	0	\$0
2010	0	33	0	180	\$83,714
2011	24,664	48	165	0	\$1,658,690
Total	31,917	183	165	180	\$2,179,846

According to the questionnaire, the current sewer rate for a single-family home is \$2.71/mo. The last fee increase was July 1, 2011; the next planned is July 1, 2012 which will be the third year of a planned increase approved by City Council in 2010. The current sewer system expenses exceed revenues; this was acknowledged in the May 2011 Engineer's Report. The Engineer's Report also explained that when it took control of the system from Los Angeles county in 1991, it inherited a budget surplus that had been used to fund improvements. That surplus has been exhausted, and the fee increase proposed to fund future projects.

Recommendation: To comply with the State Water Resources Control Board's Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements, West Hollywood should revise its SSMP to include the required capital improvement plan and financial plan.

Attachment 2
SEWAGE COLLECTION SYSTEM INSPECTION FORM
(EPA Reg 9; form revised September 23, 2010)

GENERAL INFORMATION

Inspection Date 12/22/2011

Utility Name: City of West Hollywood, California		
Address: 8300 Santa Monica Boulevard West Hollywood, California		
Contact Person: Sharon Perlstein, City Engineer		
Phone: 323-848-6383	Cell:	Fax: 323-848-6564
Email: sperlstein@weho.org		

Inspectors Names	Agency/Contractor
JoAnn Cola	U.S. EPA
Jim Fischer	State of California Water Board
Andrew Choi	Los Angeles Regional Water Board
Chris Lopez	Los Angeles Regional Water Board
Jose Morales	Los Angeles Regional Water Board

Utility personnel who accompanied inspectors.

Name	Title
Sharon Perlstein	City Engineer

SYSTEM OVERVIEW

Population: 37,000 Service Area (Sqr. Miles): 1.9
 Service Area Description: City of West Hollywood

	Residential	Commercial	Industrial	Total
Number of service connections	3,325	1,000	1	4,326

Combined Sewers (% of system): 0

Name and NPDES permit number for WWTP(s) owned or operated by the collection system utility: N/A

Name and NPDES permit number for WWTP(s) that receive flow from the collection system utility: City of Los Angeles Hyperion Treatment Plant, NPDES No. CA010991

Names of upstream collection systems sending flow to the collection system utility:
City of Los Angeles

Names of downstream collection systems receiving flow from the collection system utility:
Los Angeles County Sanitation District No. 4
City of Los Angeles

US EPA ARCHIVE DOCUMENT

Do any interagency agreements exist with upstream collection systems? (Y/N) Yes, Los Angeles County Sanitation District No. 4 holds the agreement with City of Los Angeles

Does the utility maintain the legal authority to limit flow from upstream satellite collection systems? (Y/N) Yes, Los Angeles County Sanitation District No. 4 holds the agreement with City of Los Angeles

SYSTEM INVENTORY (LIST ONLY ASSETS OWNED BY UTILITY)

Miles of gravity main	Miles of force main	Miles of Laterals	Number of maintenance access structures	Number of pump stations	Number of siphons
39.37	0	0	885	0	0

Utility responsibility for laterals (none, whole, lower) None

Size Distribution of Collection System

Diameter in inches	Gravity Sewer (miles)	Force Mains (miles)
6 inches or less	0	0
8 inches	32.72	0
9 - 18 inches	6.65	0
19 - 36 inches	0	0
> 36 inches	0	0

Age Distribution of Collection System

Age	Sewer Mains, miles	# of Pump Stations
0 - 25 years	11.81	0
26 - 50 years	9.45	0
51 - 75 years	2.36	0
> 76 years	15.75	0

SYSTEM FLOW CHARACTERISTICS

Collection System		
Average Daily Dry Weather Flow (MGD)	Peak Daily Wet Weather Flow (MGD)	Peak Instantaneous Wet Weather Flow (MGD)
5.4 MGD	Data not available from Los Angeles County Sanitation District No. 4	Data not available from Los Angeles County Sanitation District No. 4

Location of flow monitor(s) from which above information obtained: Los Angeles County Sanitation District No. 4 Trunk Lines at San Vicente Blvd./Beverly Blvd.; La Cienega Blvd./Beverly Blvd.; Havenhurst Dr./Willoughby Ave.; Gardner St./Willoughby Ave.; Fairfax Ave./Willoughby Ave.; and La Brea Ave./Romaine St.

Period over which flow was monitored: May 2009

Agency conducting the flow monitoring: Los Angeles County Sanitation District No. 4

If no flow monitors, describe method for estimating flows: N/A

Wastewater Treatment Plant		
Average Daily Dry Weather Flow (MGD)	Peak Daily Wet Weather Flow (MGD)	Peak Instantaneous Wet Weather Flow (MGD)
360 MGD (per City of Los Angeles)	850 MGD (per City of Los Angeles)	1,000 MGD (per City of Los Angeles)

Per the City of Los Angeles, the Hyperion Treatment Plant is designed to process up to 450 MGD. Also, the Hyperion Treatment Plant can handle peak wet weather flows up to 1,000 MGD for short periods.

Upstream Satellite Name	Avg. Dry Weather Flow	Peak Flow (MGD)		Flow based on meter or estimate?	
		(MGD)	% of total flow		
N/A	N/A	N/A	N/A	N/A	N/A

Constructed Overflow Points		
Overflow Point	Location	Number of Discharges/Year

N/A	N/A	N/A

REGULATORY BACKGROUND

Does the system operate under the provisions of an NPDES permit (either their own or under provisions of another agencies permit)? (Y/N) No

Permit holder N/A Permit # N/A

List provision of the permit that apply (If permit holder is other than the agency being inspected)

N/A

Does the system operate under a state permit? (Y/N) Y

Are there any spill reporting requirements? (Y/N) Y

Which agency (or agencies) promulgates the spill reporting requirements? State of California Water Resources Control Board

Outline the spill reporting requirements (summarize spill reporting requirement for each applicable statute, regulation and permit): System operates under the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2006-0003-DWQ. See City of West Hollywood Sanitary Sewer Overflow Response Instruction Manual (Appendix C of the City of West Hollywood SSMP). Overflow reporting plan starts on page 12.

SPILLS

Sanitary Sewer Overflows From and Caused by Utility									
Note: Spill Rate = number of SSOs/100 miles of sewer pipe/year									
Year	Mains (Miles of Mains 39.5)		Laterals (Miles of Laterals 81.3)			Totals (Total Miles 120.8)			
	#SSOs	(1)Spill Rate (see below)	Gross Spill Volume	#SSOs	(2)Spill Rate (see below)	Gross Spill Volume	Total SSOs	(3)Total Spill Rate (see below)	Total Gross Spill Volume
2007	9	22.8	1,150	0	0	0	9	7.5	1,150
2008	10	25.3	4,650	0	0	0	10	8.3	4,650
2009	3	7.6	4,100	0	0	0	3	2.5	4,100
2010	9	22.8	2,705	2	2.5	1,020	11	9.1	3,725
2011	3		450	2	2.5	250	5	4.1	700
Total	34		13,055	4	5	1,270	38	31.5	14,325

(1)Spill Rate = [(#SSOs in main pipe) X 100]/Miles of Main Pipe in System 39.37

(2)Spill Rate = [(#SSOs in laterals) X 100]/Miles of Lateral in System 81.3

(3)Total Spill Rate = [(#SSOs in Main + #SSOs in Laterals)X100]/[Miles of Main + Miles of Laterals] 120.7

Spill Cause

Year (as listed in Table above)	Block age	Gravi ty Pipe Break	Force Main Break	Pump Statio n	Capacity											
	Greas e	Roots	Debri s	Multi ple	#	%	#	%	#	%	#	%	#	%	#	%
2007	2	22.2	4	44.4	0	0	3	33.3								
2008	3	30	3	30	0	0	0	0	4	40						
2009	1	33.3	2	66.5	0	0	0	0								
2010	5	45.5	4	36.4	0	0	2	18.1								
2011	0	0	2	40	0	0	3	60								
Total	11	29	15	39	0	0	8	21	4	11						

Note: In 2008, there were 4 SSOs associated with one instance where a gravity pipe broke.

Please attach a copy of facility spill records for each of the past five years. The information for each spill should include, at a minimum, the following: Date of spill, time spill reported, location of spill (address and city), whether the spill occurred in a private lateral, whether it reached a surface water, total volume of the spill, volume of spill recovered, volume of spill that reached a surface water, the appearance point of the spill, final spill destination, spill cause and explanation, whether a health warning was posted. SEE EXHIBITS #2,3,4B – LA COUNTY DEPARTMENT OF PUBLIC WORKS SEWER MAINTENANCE RECORDS OF SSO CIWQS AND DISPATCH LOG.

BUILDING BACKUPS (list only backups caused by problems in sewer mains)		
Year	Number of backups	Cost of Settled Claims
2007	1 (No claims in 2007)	0
2008	4 (See Note #1 below)	\$454,764
2009	2 (One claim in 2009)	\$3,560
2010	4 (See Note #2 below)	\$18,300
2011	1 (No claims in 2011)	0
TOTAL	12	\$476,624

Note #1: In 2008, there was a sewer collapse in the mainline in Doheny Drive on 6/18/2008. Four properties were impacted with backups and filed claims. The \$454,764 was the total paid for the four claims.

Note #2. In 2010, there were three instances where blockages in the sewer mainline caused backups on private property. Properties on Flores Ave. (incident date 2/17/10) and Melrose Ave. (incident date 8/13/10) have yet had any payment by the City related to claims. On Laurel Ave. (incident date 6/29/10) backups impacted two properties. The two properties filed claims and the City paid a total of \$18,300 for the two claims.

STAFFING

Indicate *Number of Staff – As pertaining specifically to collection system responsibilities

***Provided as numerical or FTEs or positions**

Management and Administrative: Budgeted .25 Filled .25

Maintenance: Budgeted 0 Filled 0

Electricians and Mechanical Technicians: Budgeted 0 Filled 0

Operators: Budgeted 0 Filled 0

Engineering: Budgeted .75 Filled .75

Number of Certified Collection System Operators/Certification Program: 0

Number of Sewer Cleaning Crews: 0

Sewer Cleaning Crew Size: 0

Contractor Services	Contractor Name(s) (NA if contractors not used)	Cost (\$/year)
Sewer Cleaning	LA County DPW	150,000
Chemical Root Control	Duke's Root Control, Inc.	80,000
Spot Repairs	Private contractors, as needed	25,000
CCTV	Private contractors	50,000
Spill Response	LA County DPW	Included in the \$150,000 for sewer cleaning noted above
Other:		

Note: Collection system operation and maintenance is done as a contract service by Los Angeles County Department of Public Works (LACDPW). See Exhibit #10A for information regarding the LACDPW Sewer Maintenance South Yard personnel.

EQUIPMENT

List Major Equipment Owned by the Utility: None, equipment listed is owned by LACDPW.

Equipment	Number (all yards)	Number in Service (all yards)
Combination Trucks (hydroflush and vactor)	4	4
Hydroflusher	11	10
Mechanical Rodder	11	10
CCTV Truck	5	3
Utility Truck	16	12
Portable Pumps	10	As needed
Portable Generator	7	7

FINANCIAL

Does the collection system operate from an enterprise fund? Yes. For detailed information regarding revenue and expenses for the City's sewer program, see Item 16 Additional Documentation: *Engineer's Report to City Council for the Annual Sewer Service Charge, Fiscal Year 2011/2012.*

REVENUES	
Revenue Source	Annual Revenue (\$/year)
User Fees	\$978,000
Connection Fees	
Grants	
Bonds	
SRF Loans	
TOTAL	\$978,000

EXPENSES		
Expense	Annual Cost (\$/year)	Cost / Mile of Pipe (Total Pipe Mileage: <u>39.37</u>)
Maintenance	305,000	\$7,747.02/mile
Operations (electric, fuel, etc.)	(included above)	
Salaries and Benefits	197,000	5,003.81/mile
Capital Improvements	485,000	12,319.02/mile
Debt payments		
TOTAL	987,000	25,069.85

Average Monthly Household User Fee for Sewage Collection: \$2.71/month = \$32.48/year
 Wastewater Treatment: \$150/yr / SFDU (LACSD)
 Total Wastewater Fees: \$15.21 / mo

Sewer Fee Rate Basis (i.e. water consumption, flat rate, etc.): The City Sewer Service Charge is a flat rate for residential dwelling units. For commercial, the rates are based on land use code, parcel size, and average daily sewage generation rates. See details of the rate structure in Item #16 Additional Documentation: Engineer's Report to City Council for the Annual Sewer Service Charge, Fiscal Year 2011/2012.

Last Fee Increase (Date): July 1, 2011

Planned Fee Increases: July 2012. This will be the 3rd year of a phased-in rate increase that was approved by the City Council in 2010. The rate will go to \$37.90/year for 1 Single Family Dwelling Unit.

Capital Improvement Fund: \$485,000 \$ for 1 years

SPILL RESPONSE, NOTIFICATION AND REPORTING

Does the Utility Have a Written Spill Response Plan? Yes
 Is the Plan Carried by Maintenance/Spill Response Crews? Yes

Indicate Elements Included In the Spill Response Plan		
Element	Y/N	Comment
Identification of Responsible Staff	Y	
DISPATCH		
System for Becoming Aware of Spills	Y	
System for Receiving Public Calls	Y	
Dispatch Procedures – Normal Hours	Y	
Dispatch Procedures – After Hours	Y	
Coordination with First Responders (police, fire department)	Y	Sheriff Dept./County Fire District contact LACDPW dispatcher
Response Time Goal	Y	2 hours
SPILL CONTROL/MITIGATION		

Spill Response Activity Sequence	Y	See LACDPW/City SSMP
Spill Site Security	Y	
Procedures for Stopping Spills	Y	
Spill Containment	Y	
Protection of Storm Drains	Y	
Cleanup/Mitigation	Y	
DOCUMENTATION		
Spill Volume Estimation Method (list method in comment field)		Visual, charts, etc.
Determination of Spill Start Time	Y	
Spill Sampling	Y	Only if needed
Receiving Water Sampling	Y	
Photographing Spill Site	Y	Sometimes
Field Notes Form	Y	
Spill Report Form	Y	
NOTIFICATION		
Notification of Affected Public (schools, recreational users, etc.)		Only if needed
Posting Warning Signs		Only if needed
Sanitation Information re: building backups	Y	
REPORTING		
Reporting Procedures	Y	
Spill Report Forms	Y	
Persons Responsible for Filing Reports	Y	

Are all spills reported regardless of volume? Yes

Are Contractors Required to Follow Spill Response Procedures? Yes

Average Spill Response Time (normal work hours): 0.9 hours

Average Spill Response Time (after hours/holidays): 1.6 hours

Does the Utility CCTV Pipes Following Spill? Yes

Are Cleaning Schedules Adjusted in Response to Spills? Yes

SEWER CLEANING AND MAINTENANCE

Does the Utility Have Detailed Sewer System Maps? Yes
 Are Maps on GIS Database? Yes, LACDPW has sewer maps on GIS
 Are Maps Available to Maintenance Crews? Yes

Maintenance Management System is (check whichever is applicable):
 Written Computerized Both X Other (describe)

ANNUAL SEWER CLEANING – Include hydroflushing, mechanical and hand rodding		
Pipe Cleaning excluding repeats		Pipe Cleaning Including Repeats
(miles/year)	% of system/year	(miles/year)
13	30	42

What does the crew report for total length of pipe cleaned in a single visit if they clean the same pipe segment more than once during that visit? Crew reports just the length of the pipe segment.
 System Cleaning Frequency (years to clean entire system): 3
 Types of problems subject to hot spot cleaning? grease, roots

HOT SPOT CLEANING SCHEDULE			
Cleaning Frequency	Number of Locations	Pipe length excluding repeats (miles)	Pipe length including repeats (miles)
1/month	15	0.57	6.89
6/year	35	1.38	8.07
4/year	60	2.77	11.09
2.4/year	4	0.20	0.52
2/year	2	0.12	0.25

CHEMICAL ROOT TREATMENTS

Length of pipe subject to chemical root treatments (miles/year): 7.5 to 9.5 miles/year

Chemical treatment frequency: 3 year cycle

Root treatment chemicals used: Razerooter II, Diquat Dibromide

SPOT REPAIRS (Note: spot repairs only occasional, if encountered during maintenance)

Spot repairs completed annually: varies (#/year); varies (miles/year)

Spot repair budget (\$/year): \$25,000 contingency fund

Spot repair expenditures last year: \$ 0; year: 2011

ODORS

Annual number of complaints: 0

Odor hot spot locations: N/A

Odor treatment facilities: N/A

EASEMENT PIPE CLEANING

Total length of easement pipes (miles): 1.29

Annual easement pipe cleaning (miles/year): 0.65

Do maintenance workers have access to all easements? Some easements are limited access, reachable only on foot, not vehicle. The City hires a private plumbing contractor to clean sewer lines located in easements where LACDPW will not access the easement.

FATS, OILS AND GREASE (FOG) CONTROL

Does the Utility have a FOG source control ordinance? Yes

Ordinance Citation: West Hollywood Municipal Code Chapter 15.04; LA County Plumbing Code, Title 28

Agency responsible for implementing the FOG control program: LACDPW under contract

Number of Food Service Establishments (FSEs) in service area: 246

Number of FSEs subject to FOG ordinance: 246

Indicate Elements Included In the Food Service Establishment FOG Source Control Program		
Element	Y/N	Comment
FSE Permits	Y	
FSE inspections	Y	
FSE enforcement	Y	
Oil & grease discharge concentration limit	Y	See Permit Part D
Grease removal device (GRD) requirements:		
traps	Y *	* Not always present due to space
interceptors	Y *	Constraints, Health Code requirements,
Automatic cleaning traps	Y *	Or other variances.
FSEs subject to GRD installation:		
all FSEs (new and existing)	Y/N *	* FSEs that do not cook food on site are not
new FSEs	Y *	Always subject to GRD installation.
remodeled FSEs	Y *	
for cause at existing FSEs	Y	
GRD maintenance requirements:		
Cleaning frequency	Y	See Permit Part F for minimum
25% rule (grease and solids accumulation)	N	requirements

Kitchen BMP Requirements (list required BMPs below)		
Good cleaning practices	Y	See Permit Attachment "Good Cleaning Practices"
Allowance for chemical additives?	N	
Allowance for biological additives?	N	
FOG Disposal Requirements	Y	
FOG Disposal Manifest System	Y	See Permit Part F

Number of FOG Program staff:

Inspectors 11 * * LACDPW staff is available for FOG program in City of West
 Permit writers 3 * Hollywood. Staff also provides service to other contract cities and
 Other _____ to unincorporated County.

FSE Inspection frequency: Typically, once per year

Annual number of FSE inspections: Per LACDPW records, there were 113 FSE inspections in 2011.

Does Utility use CCTV to identify FOG sources? Yes

Does sewer maintenance staff coordinate with FOG source control program staff? Yes

Cleaning targeted to FOG hot spots? Yes

Maintenance crew referrals to FOG program? Yes

Pipe repairs at FOG hot spots? Not typically, as FOG hot spots are due to accumulation of grease, not deterioration of the sewer pipe.

Describe program for public outreach and education related to residential FOG sources: Annual Report mailed by LACDPW, City website has information, and notices delivered to specific hot spots by LACDPW Industrial Waste field staff.

PIPE INSPECTION AND CONDITION ASSESSMENT

Gravity Main Inspection

Describe Pipe Inspection Methods: CCTV inspection of pipelines and visual inspection of manholes.

Miles of Pipe Inspected in the Last 10 Years and Planned Inspection Next 10 Years				
Date Range	Inspection Method	Miles of Pipe without repeats	Useable Condition Assessment	
			Miles of Pipe (without repeats)	% of System (System miles:)
2005 to present	CCTV	20.5		
19__ to present	Other			
Present to 2022	CCTV	20		
Present to 20__	Other			

Describe Planned Pipe Inspection: The City is implementing a program to CCTV inspect approximately 10% of the sewer system each year. In FY 11-12, the Mid-City area is being inspected. The next area will be an area in the western portion of the city.

Summary of Condition Assessment Findings: Since a large percentage of the sewer system is over 75 years old, the City's CCTV inspection has identified a lot of deterioration which can be resolved with CIPP lining (i.e., cracks). In FY 09-10, the East Side area of the city was inspected. Of the 36,324 LF of sewer inspected, 68% of the lines were identified as needing CIPP lining.

Force Mains

Describe Force Main Inspection Methods: N/A

Describe Program for Inspecting Air Relief Valves: N/A

Private Laterals

Does the Utility Inspect Private Laterals? No

Number of Private Laterals Inspected 19__ to Present: 0

Summary of Inspection Findings: N/A

Number of Private Laterals Planned for Inspection Present to 20__ : None

CAPACITY ASSURANCE

List Locations and Dates of Repeats Capacity Spills: No capacity spills.

List Locations of Known Capacity Bottlenecks:

Dry Weather: None known

Wet Weather: None known

Describe I&I Assessments Completed by the Utility (dates, area covered, findings, etc.):

Assessment done during preparation of the City's Master Plan of Sewers in 1991. Problem sewer lines, located in the southwest area of the city, were rehabilitated in FY 96-97. 11,400 LF of CIPP lining and 1,530 LF of pipe replacement was installed.

Flow Meters (number, locations): No permanent flow meters. Los Angeles County Sanitation District No. 4 does some metering (see page 3).

Describe Flow Model Used by the Utility: Boyle Engineering's BSWAN computer model is used by the City for capacity analysis.

Inflow

Does the Utility Prohibit Storm Water Connections to the Sanitary Sewer (roof drains, sump pumps, etc.)? Yes

Describe Program for Enforcing Ban on Illicit Connections: Screening done by Public Works staff when applicants take out Encroachment Permits for work in the public right of way. Also, residential and commercial code enforcement officers work with Building and Safety staff to deal with illegal/unpermitted construction.

Describe Program for Locating Illicit Connections (smoke testing, etc.): The City contracts with John L. Hunter & Associates to assist with investigation of illicit connections. John L. Hunter can perform smoke and dye testing, if needed, to investigate potential illicit connections. They also have staff that advise the property owner of methods to eliminate any violations.

Locations Subject to Street Flooding: The City does not have any areas subject to significant street flooding. Over the past 20 years, two regional relief storm drains were built by the Los Angeles County Flood Control District, which mitigated this issue.

Has the Utility Sealed Manholes in Locations Subject to Street Flooding: Yes, this was done in the mid-1990s on Melrose Ave., near San Vicente Blvd. The work was done prior to construction of a regional relief storm drain by Los Angeles County Flood Control District.

I&I Control

Describe I&I Control Projects (miles of pipe rehabilitated or replaced for I&I Control)

Recently Completed Projects: Sewer lining and rehabilitation was done in the southwest part of the city where high groundwater table was flowing into cracked sewers. In FY 96-97, the City constructed a project which included 11,400 LF of CIPP lining and 1,530 LF of pipe replacement to address the I/I issue.

Planned Projects: No projects are planned at this time to specifically address I/I. This is because I/I has not been identified when CCTV inspection has been done of sewer lines during the past few years.

Describe Capacity Control Measures (relief sewers, storage, WWTP expansion, etc.)

Recently Completed Projects: None recently done.

Planned Projects: No projects are planned at this time to specifically address capacity. Proposed development projects are required to prepare a Sewer Capacity Study to verify if existing sewer capacity can accommodate flows from proposed development. Also, developers must get a clearance from the City of LA Bureau of Sanitation to verify downstream capacity. At this time, redevelopment projects have not generated increased sewer flows; therefore, no projects to enhance capacity are pending.

INFRASTRUCTURE RENEWAL AND CAPITAL IMPROVEMENTS

Pipe Rehabilitation and Replacement Methods Used:

Miles of Pipe Rehabilitated or Replaced: Last 10 Years and Planned Next 10 Years		
Date Range	Miles of Pipe	% of System (System miles:)
2002 to present	9	23
Present to 2022	Estimate 10 to 15 miles	25 to 30%

Describe Capacity Improvement Program: The City's Master Plan of Sewers includes computer modeling to examine the capacity of the system under existing conditions as well as under build-out of the City in compliance with the General Plan zoning. The Master Plan of Sewers did not identify any locations with existing capacity issues. However, the Master Plan of Sewers did identify some areas where possible capacity limitation could occur as areas redevelop. Therefore, the City requires all developers to submit a Sewer Capacity Study during the environmental clearance process. To date, no new developments have been at a higher level of sewer generation, which would require installation of a sewer line upgrade/capacity enhancement.

List Major Planned Improvements: The City has been conducting CCTV evaluation of approximately 10% of the sewer mainlines each year. Depending on the results of the CCTV, rehabilitation work is scheduled. In FY 11-12, the City has identified approximately 10,000 LF of deteriorated sewer line in the Mid-City area, located between La Cienega Blvd. and Fairfax Ave. Construction documents (plans and specifications) are in progress, with construction anticipated for Fall 2012. The estimated project cost is \$600,000.

Describe Master Plan: In 1992, the City commissioned Boyle Engineering Corp. for preparation of a comprehensive Master Plan of Sewers. The Master Plan in an Integrated Correction Program, which includes the following elements in a comprehensive capital improvement, preventative maintenance program: Capacity correction, I/I correction, structural rehabilitation, cyclic repair/operation & maintenance, and finance program. As mentioned above, the Master Plan includes a computer model to examine the capacity of the sewer system under existing conditions as well as under build-out of the city in compliance with the General Plan zoning. The Master Plan of Sewers has been updated from time to time. For instance, in 2000 Boyle Engineering updated the computer model to forecast sewer impacts due to zoning changes from the Sunset Specific Plan, which amended the General Plan.

PUMP STATIONS

(Please complete one sheet for EACH pump station)

Name and Location of Pump Station: N/A – West Hollywood has no pump stations.

Pump Information

Pump #/Name	Dry or Submersible	Capacity	Constant or Variable	In Service?

Pump Station Information:

- A. Average flow: _____
- B. Holding Time: _____
- C. Does station have sufficient pumping capacity with the largest pump out of service during:
 Peak Dry Weather Flow: Yes _____ No _____
 Peak Wet Weather Flow: Yes _____ No _____
- D. Dry weather capacity limitations? Y/N (if yes, describe) _____
- E. Wet weather capacity limitations? Y/N (if yes, describe) _____
- F. Number of failures resulting in overflows/bypass or backup, in the last five years _____
- G. Total quantity of overflow/bypass: Gallons or MG _____
- H. Is dry well protected from wet well overflow? Yes _____ No _____
- I. How often is pump station inspected? _____
- J. **Back up power sources and type:**

On-site generators	Portable Generators	Back-Up Line from same grid?	Back-up Line from different grid?	Other (describe)
Yes _____ No _____	Yes _____ No _____	Yes _____ No _____	Yes _____ No _____	

If generators on-site, describe testing and maintenance procedures: _____

K. Station Alarms:

Low Wet Well	High Wet Well	Power Loss	Unauthorized Entry	Other (Describe)
Yes _____ No _____				

- a) Is there 24 hour coverage for alarms? Yes _____ No _____
- b) Alarm signal sent to: _____

L. What equipment is available for emergency response? _____

M. Are there SCADA controls? Yes _____ No _____
 If yes, ability to operate station remotely? Yes _____ No _____

INSPECTION FORM TRANSMITTAL

Date Inspection Form Finalized: 5/30/2012

Date Final Inspection Report Sent to Facility: 7/20/2012

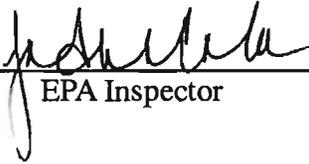
Person(s) to Whom Inspection Form Sent: SHARON PERLSTEIN

SHARON PERLSTEIN CITY ENGINEER CITY OF WEST HOLLYWOOD
Name Title Address

HUGH MARLEY ENFORCEMENT CHIEF LOS ANGELES REGIONAL WATER BOARD
Name Title Address

JIM FISCHER INVESTIGATOR CALIFORNIA WATER RESOURCES CONTROL BOARD
Name Title Address

Signed by:

 8/19/2012
EPA Inspector Date